



*Carolyn Tatum Roddy*  
Attorney, State Regulatory

**VIA FED EX**

Mr. David Waddell  
Executive Director  
Tennessee Regulatory Authority  
460 James Robertson Parkway  
Nashville, TN 37243-0505

RE: Petition of AT&T Communications of the South Central States, Inc. for  
Termination of Universal Service Docket NO. 95-02499 and Commencement of a  
New Generic Contested Universal Service Proceeding, Docket No.97-00888

Dear Mr. Waddell:

Please find enclosed the original and thirteen (13) copies of a Motion to Intervene  
on behalf of Sprint Communications Company, L.P. in the above captioned matter.

An extra copy of this transmittal letter is included which I would ask that you  
please date stamp and return to me for my files in the enclosed addressed stamped  
envelope. Enclosed is a check in the amount of \$25.00 for the filing fee.

Thank you for your cooperation.

Sincerely,

*Carolyn Tatum Roddy*

Carolyn Tatum Roddy

CTR:vw

cc: Val Sandford

3100 Cumberland Circle  
Atlanta, GA 30339  
Telephone: (404) 649-6788  
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May 7, 1997

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BEFORE THE  
TENNESSEE REGULATORY AUTHORITY

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In re:

Petition of AT&T Communications )  
of the South Central States, Inc. )  
for Termination of Universal Service )  
Docket No. 95-02499 and )  
Commencement of a New Generic )  
Contested Universal Service Proceeding )

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Docket No. 97-00883

**MOTION TO INTERVENE**  
**BY SPRINT COMMUNICATIONS COMPANY, INC. L.P.**

Comes now Sprint Communications Company L.P. ("Sprint"), pursuant to Tenn. Code Ann. Section 4-5-310, and files this Motion to Intervene in the above-referenced proceeding. In support of this Motion, Sprint respectfully states as follows:

1. Sprint is an interexchange carrier authorized to offer service in the State of Tennessee. Sprint is also authorized to offer local exchange service and is currently negotiating the final terms of an interconnection agreement with BellSouth Telecommunications, Inc. ("BellSouth") which would enable it to eventually offer competitive local exchange service under the terms of the Telecommunications Act of 1996 (the "Act"). Sprint will, therefore, be affected by any decisions made in the generic contested case proceeding concerning universal service.

2. Sprint's participation in the above-captioned proceeding is necessary to protect its interest in the consideration of the generic contested reform of universal

service. Since Sprint's rights and interests may be substantially affected by decisions made by the Tennessee Regulatory Authority ("TRA") in this proceeding and these rights and interests cannot be adequately represented by any other party in this Docket, Sprint respectfully requests that it be granted leave to intervene and to participate fully as a party in this matter, including the right to present testimony and exhibits, cross-examine witnesses, present argument and file briefs as allowed by the TRA.

3. Intervention by Sprint is likely to present issues and to develop facts that will assist the TRA in fully considering the issues presented in this proceeding without delaying, complicating or disrupting the proceeding.

Wherefore, Sprint Communications Company L.P. requests that the TRA issue an order granting it full intervenor status.

Respectfully submitted,

Sprint Communications Company L.P.

A handwritten signature in black ink that reads "Carolyn Tatum Roddy". The script is cursive and fluid.

Carolyn Tatum Roddy

Attorney

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